

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AISHA POPE #228305,

Case No. 19-cv-10870

Plaintiff,

v.

Hon. David M. Lawson
Mag. Michael J. Hlunchaniuk

CORIZON HEALTH, *et al.*,

Defendants.

The Law Office of Keith Altman
Keith Altman (P81702)
Attorney for Plaintiff
33228 West 12 Mile Road, Ste. 375
Farmington Hills, MI 48334
(516) 456-5885
kaltman@lawampmmt.com

Raina Korbakis (P49467)
Assistant Attorney General
Attorney for MDOC Defendants
Michigan Department of Attorney General
MDOC Division
P.O. Box 30217
Lansing, MI 48909
(517) 373-1162

Chapman Law Group
Ronald W. Chapman (P37603)
Wedad Ibrahim (P81970)
Attorneys for Corizon Defendants
1441 W. Long Lake Rd., Ste. 310
Troy, MI 48098
(248) 644-6324
wibrahim@chapmanlawgroup.com
rchapman@chapmanlawgroup.com

DECLARATION OF EDDIE BRICENO

I, EDDIE BRICENO, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 21 years of age and have personal knowledge of the facts contained in this Declaration.
2. I am a Senior Litigation Paralegal with the Law Offices of Keith Altman, counsel to Plaintiff, Aisha Pope in the above-referenced matter. I have been a Paralegal for over 20 years.

3. In the course of working on the above-referenced matter, I have been in communication with Ms. Pope to prepare her responses to Defendant's discovery demands.

4. On July 1, 2021, I reached out to Ms. Pope by text message regarding scheduling a time to go over Defendant's discovery demands and drafting the responses.

5. On that same date, Ms. Pope responded to my text that her son had drowned.

6. Out of respect to Ms. Pope and to give her time to mourn, we did not continue to set up a meeting to go over Defendant's discovery demands.

7. On July 12, 2021, after giving Ms. Pope some time to heal and mourn, I reached out again to see if she was in any condition to go over the discovery demands and other matters relating to the above-mentioned case.

8. Shortly after, Ms. Pope returned my call and agreed to review the discovery demands.

9. On July 13, 2021, I spoke with Ms. Pope and spoke about the tragic incident of her son drowning and again offered my condolences before we spoke about the responses to the discovery demands.

10. Ms. Pope said she was making funeral arrangements for her son but agreed to review the discovery demands and have responses to our office by end of day Friday, July 16, 2021.

11. Ms. Pope added that she had surgery on Monday, July 12, 2021, for her colon cancer caused by blood in her system for approximately two (2) years.

I DECLARE THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT
TO THE BEST OF MY KNOWLEDGE.


EDDIE BRICENO

July 13, 2021
DATE